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November 28, 2012

Robert Weisenmiller, Chairman
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street, MS-4
Sacramento, CA 95814

California Energy Commission

DOCKETED
12-BSTD-2

TN # 68781

NOV. 29 2012

Regarding: Docket No. 12-BSTD-2

Dear Chairman Weisenmiller:

I am writing in support of the California Energy Commission's proposal to require certification for anyone who performs Title 24 Acceptance Testing and Documentation for advanced lighting control systems and heating, ventilation, and air conditioning (HVAC) systems. The proposed regulations strike an appropriate balance between ensuring individuals performing acceptance tests and preparing accompanying documentation are properly trained and that systems are properly installed while not adding costs or delays to projects.

I also support the Commission's decision to take advantage of the existing certification programs that have been outlined in the proposed regulation. These certifications provide the training, hands-on experience and oversight needed to ensure that technicians will be able to perform acceptance tests in real-world applications. Regarding advanced lighting controls, no comparable certification like California Advanced Lighting Controls Training Program (CALCTP) exists; since there are already thousands of CALCTP-certified technicians throughout the state, the designation of CALCTP as a pre-approved certification provider will ensure rapid implementation of this requirement and help California meet its energy efficiency goals. Regarding HVAC systems, the Testing-Adjusting-Balancing (TAB) certification bodies identified in the regulation are well-respected, nationally-renowned programs with rigorous curriculum, hands on training, and quality controls. These TAB technicians are available throughout the state and no other certifications exist that provide the training expertise and quality control necessary to ensure that HVAC systems actually perform as required under Title 24. The California Green Building Code already requires small commercial buildings to balance their HVAC systems in accordance with TAB, Associated Air Balance Council (AABC) or National Environmental Balancing Bureau (NEBB) procedures, so this requirement will ensure consistency with current practices.

Thank you once again for your thoughtful consideration and development of these regulations. I urge the Commission to approve these regulations at the December 12, 2012 hearing.

Sincerely,

Assemblymember Steven Bradford
51st Assembly District

cc: Docket Office

